

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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UNITED STATES OF AMERICA

Plaintiff,

CASE NO: 00-6309-CR-SEITZ
CLARENCE MADDOX
CLERK U.S. DIST. CT.
S.D. OF FLA - MIA

v.

DAVID BELL,

Defendant.

MOTION TO MODIFY JUDGMENT IN A CRIMINAL CASE

THIS CAUSE coming on Motion of the Defendant, and respectfully prays unto this Honorable Court for an amended judgment in the above-captioned criminal case and as grounds therefore, states the following:

1. On August 16, 2002, the Honorable Patricia Seitz, entered a judgment and sentence in the above-captioned cause.
2. As part of the judgment and sentence, the Court recommended that the Defendant serve his prison term at a camp in South Florida.
3. The judgment further orders the Defendant to surrender to the United States Marshall for this District on November 12, 2002 at 2:00 p.m.
4. On August 28, 2002, the Bureau of Prisons instructed DAVID BELL to voluntarily surrender to the US Marshall's Office, at 301 North Miami Ave., Room 205, Miami, Florida on November 12, 2002, before 2:00 p.m.
5. The Defendant desires to surrender at the actual institution designated rather than surrender to the US Marshall's Office at 301 North Miami Ave., Miami, Florida.

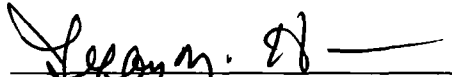
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6. By taking this action, the Defendant will not have to remain in the downtown facility and be transported to the designated facility.
7. It is more economical and convenient for all parties if the Defendant surrenders at the designated institution.
8. Undersigned counsel has discussed this matter with the Community Corrections Manager of the Bureau of Prisons who advises that the judgment needs to be modified to facilitate this procedure.
9. Undersigned counsel has conferred with Brian McCormick who voices no objection to this modification.

WHEREFORE, the undersigned counsel respectfully prays unto this Honorable Court for an Order modifying the judgment in the above-captioned criminal cause to instruct the Defendant to surrender at the actual designated facility.

Respectfully submitted,

JEFFREY M. HARRIS, P.A.
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JEFFREY M. HARRIS
Fla. Bar # 195981

I HEREBY CERTIFY that a true and correct copy of this foregoing has been furnished by U.S. Mail this 12 day of September, 2002, to H. Brian McCormick, Assistant U.S Attorney, 500 East Broward Blvd., Suite # 700, Fort Lauderdale, FL 33394.


JEFFREY M. HARRIS